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Attorney for Petitioner
China Literature Ltd.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: 17 U.S.C § 512(h) SUBPOENA TO
PONYNET, US

MISCELLANEOUS ACTION NO.

**DECLARATION OF SHUYUE WANG
IN SUPPORT OF ISSUANCE OF
SUBPOENA PURSUANT TO 17 U.S.C.
§ 512(h)**

I, Shuyue Wang, the undersigned, declare and testify as follows:

1. I am the Corporate Legal Counsel of China Literature Ltd. ("China Literature").
As part of my duties, I am responsible for monitoring and addressing infringement of copyright rights owned by China Literature and its affiliated companies.

2. I submit this declaration in support of China Literature's request for issuance to PONYNET, US ("Ponynet") of a subpoena pursuant to 17 U.S.C. § 512(h) to identify the person(s) infringing China Literature's copyrighted works using services provided by Ponynet, as identified in the 512(c)(3)(A) notification accompanying this declaration. I have personal knowledge of the facts contained herein and, if called upon to do so, I could and would testify competently thereto.

3. On November 27, 2024, King & Wood Mallesons LLP ("KWM") served via email a notification to Ponynet at admin@frantech.ca and abuse@frantech.ca, identifying the infringing content on the domain hosted by Ponynet and providing the information required by 17 U.S.C § 512(c)(3)(A).

4. Attached hereto as Exhibits 1 and 2 are true and correct copies of the copyright notification dated November 27, 2024, and the email sent to Ponynet. KWM was and is authorized to act on behalf of China Literature in submitting this notification.

5. The purpose for which the subpoena is sought is to obtain the identity of the alleged infringer(s), who have exploited China Literature's exclusive rights in their copyrighted e-books without its authorization. The information obtained therefrom will only be used for the purpose of protecting China Literature's rights under the U.S. Copyright Act.

I declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct to the best of my knowledge, information or belief.

Executed in Beijing, on December 9th, 2024.

Respectfully submitted,

By: Shuyue Wang
Shuyue Wang